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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

STATE OF TEXAS,)
)
Plaintiff,)
)
v.)
)
U.S. DEPARTMENT OF THE)
INTERIOR, ET AL.,)
Defendants.)
_____)

Case No. 7:24-CV-00233-DC-RCG

**JOINT MOTION TO
STAY LITIGATION FOR 90 DAYS**

The Parties—the State of Texas; the U.S. Department of the Interior; the U.S. Fish and Wildlife Service; Doug Burgum, in his official capacity as Secretary of the Interior; and Paul Souza, in his official capacity as Regional Director of Region 8, exercising the delegated authority of the Director of the U.S. Fish and Wildlife Service—hereby jointly respectfully move for a stay of the above-captioned litigation for approximately 90 days, through September 29, 2025.

The Court has broad discretion to stay the litigation under its inherent authority to “control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *Clinton v. Jones*, 520 U.S. 681, 706 (recognizing court has “broad discretion to stay proceedings as an incident to its power to control its own docket”). Under the Court’s Amended Scheduling Order (ECF No. 16) and subsequent order granting extensions (ECF No. 24), the Parties have completed their obligations to date and have several deadlines approaching. For example, the Parties must meet and confer regarding administrative record issues by July 2, 2025, and Defendants must transmit to Plaintiff and lodge with the Court the administrative record by July 30, 2025. ECF No. 24 at 1. Plaintiff must file any objections or motions to complete or supplement or amend the administrative record by September 3, 2025. *Id.* at 2.

The Parties are currently exploring, in good faith, their options for resolving this case without further litigation. Therefore, they respectfully request a brief stay to allow them to focus on exploring these options and to avoid potentially unnecessary expenditures of time and effort toward resolving administrative record issues, finalizing the administrative record, and briefing any objections or motions. Additionally, the stay will avoid expending the Court’s resources with potentially unnecessary filings. The Parties also propose that, no later than seven days before the

close of the stay, they will file a joint status report informing the Court of whether they seek a continuance of the stay and, if applicable, proposing recommendations for a new scheduling order.

A proposed order is attached.

Dated: July 2, 2025

Respectfully submitted,

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/s/ Angela Mo
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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2025, I electronically filed the foregoing Joint Motion to Stay Litigation for 90 Days with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to:

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